

FCC MAIL ROOM
DOCKET FILE COPY ORIGINAL
MAY 13 1999
RECEIVED

Wednesday 12 May 1999

Wesle AnneMarie Dymoke

Regional Coördinator for New England and Vicinity, the Amherst Alliance
69 Governor St. #327
Providence, Rhode Island RI 02906-3075
(401) 925-0348
ao780@osfn.org / WesDym@yahoo.com

Secretary
Federal Communications Commission
The Portals
455 Twelfth Street NW
Washington DC 20554

Re: Docket No. MM 99-25 (LPRS) (a.k.a. RM-9208 & RM-9242)

Opposition to Request for Further Extension of Comments Deadline

To Whom it May Concern:

As Regional Coördinator of New England and Vicinity for the Amherst Alliance, and as a contributing party in the ongoing discussions regarding Low-Power Radio Service and Low-Power FM (LPRS/LPFM), I hereby submit this Opposition to the recent request for a further extension of the Comments Deadline for FCC Docket No. MM 99-25 (LPRS), submitted by the National Association of Broadcasters (NAB), the Corporation for Public Broadcasting (CPB), and National Public Radio (NPR), for the following reasons:

- 1) The parties requesting extension have already previously requested such an extension to the original Comments Deadline. The FCC granted a partial extension, having considered already the first request. This second request amounts to a "sour grapes" refile of the original request, because the NAB didn't get its way the first time. If the FCC believes that the extension period it has already granted is reasonable, then there is no argument for a further extension. Would that we could all get what we want simply by asking again and again. The NAB made its request, the FCC reviewed it and acted in accordance to its judgement, and that should be that. The NAB has not provided new and compelling reasons for a different decision in this matter.
- 2) The specific technical concerns referred to (need for interference studies) have been suitably addressed by many parties. Further, the NAB and its associates have had more than ample time to initiate and complete their own studies. Perhaps they did not think until very recently that there would be any real possibility of LPRS going through, and now in their rush to oppose it, are using this as an excuse. In any case, there has been more than enough time for everyone to do their own studies. It is worth adding that the technology of LPRS is not different than that which has governed radio for nearly a hundred years, and that the math is quite easy to do, with or without practical field studies for comparison and verification; further, nearly two decades of pirate broadcasts have provided plenty of real-world data to demonstrate the effects in question.
- 3) At the request of Amherst Alliance and others, many or most unlicensed broadcasters have agreed to discontinue all illicit transmissions during this discussion. It has been difficult to persuade many of them, as they have nearly all greatly distrusted the word of the

No. of Copies rec'd _____
List ABCDE _____
0715

government; part of the persuasion was an assurance that the period would be unlikely to exceed several months. With repeated delays, both the patience of pirates and their faith in the current process is waning, and further delays may result in a resumption of illicit broadcasts, and perhaps even an expansion of this activity nationwide, which may be difficult or impossible to curtail at a later date, if pirates decide that repeated delays constitute or reflect a lack of good faith.

Moreover, many prospective LPRS operators have been waiting for this period, and are increasingly frustrated by the delays, especially as it becomes less clear what the "real" deadlines will be. The FCC needs to draw the line for everyone, and make it stick.

In view of these arguments, the request by NAB, CPB, and NPR for further extension of the Comments Deadline for FCC Docket No. MM 99-25 is unnecessary, unwarranted, and specious, and I firmly Oppose this request.

Signed,

A handwritten signature in black ink, reading "Wesle AnneMarie Dymoke". The signature is fluid and cursive, with the first name "Wesle" being the most prominent.

Wesle AnneMarie Dymoke

Regional Coördinator for New England and Vicinity
The Amherst Alliance